

1 on the grounds the Parties have experienced unavoidable delays in obtaining
2 essential fact discovery and require additional time for these purposes.

3 On January 8, 2025, the Court entered the granted the parties Stipulated
4 Motion to Amend the scheduling order setting: April 28, 2025, as the deadline to
5 complete fact discovery; May 19, 2025, as the date for Plaintiff's expert disclosures;
6 June 30, 2025, as the date for Defendant's expert disclosures; and July 28, 2025, as
7 the deadline to complete expert discovery. (Dkt. No. 28.)

8 Defendant served their Notice of Deposition of Plaintiff Sean Bennett for
9 April 3, 2025. Due to all counsels' schedules the deposition did not go forward as
10 planned and the Parties are coordinating on a new date. However, Plaintiff has
11 recently suffered a stroke and his current availability is limited as a result. Further,
12 counsel for defendant is working on obtaining dates for employees of American
13 Airlines. The parties have been meeting and conferring and should have dates
14 certain shortly so the depositions will go forward.

15 The fact discovery cutoff is one day away. Additional time is needed for the
16 Parties to wrap up essential fact discovery including the foregoing depositions and
17 any follow up discovery warranted by the testimony of said witnesses and, if
18 necessary, seek this Court's assistance in this regard.

19 This is the Parties' second request for an extension. This request is not made
20 for the purpose of delaying the case, and neither party will be prejudiced by
21 modifying the scheduling order. The requested extension relates to the fact and
22 expert discovery deadlines, and the deadline for dispositive motions.

23 The Parties agree that good cause exists, and respectfully request, to amend
24 the current scheduling order and respectfully propose the following modifications:

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	CURRENT DATE	PROPOSED NEW DATE
Fact Discovery Cutoff	April 28, 2025	June 9, 2025
Plaintiff's Expert Disclosures	May 19, 2025	June 30, 2025
Defendant's Expert Disclosures	June 9, 2025	July 21, 2025
Rebuttal Expert Disclosures	June 30, 2025	August 11, 2025
Expert Discovery Cutoff	July 27, 2025	September 1, 2025
Deadline to File Dispositive Motions	August 1, 2025	September 8, 2025

Respectfully submitted,

Dated: April 25, 2025

MILLS + WOODS LAW, PLLC

By: /s/ Sean A. Woods (with permission)
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 Sean A. Woods, Esq.
Attorneys for Plaintiff, Sean Bennett

Dated: April 25, 2025

**WILSON, ELSER, MOSKOWITZ,
 EDELMAN & DICKER, LLP**

By: /s/ Sarena Kustic
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 Taylor Allin, Esq.
 Sarena L. Kustic, Esq.
*Attorneys for Defendant, American
 Airlines, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that this document was filed and served this 25th day of April 2025, using this Court's CM/ECF filing system which will electronically transmit a copy to all counsel of record.

Dated: April 25, 2025

**WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER, LLP**

By: /s/ Sarena Kustic
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